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OLD REPUBLIC NATIONAL TITLE INSURANCE  
COMPANY  
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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11  
12 DEUTSCHE BANK NATIONAL TRUST  
13 COMPANY, AS INDENTURE TRUSTEE  
14 UNDER THE INDENTURE RELATING TO  
IMH ASSETS CORP., COLLATERALIZED  
ASSET-BACKED BONDS, SERIES 2005-7,  
15 Plaintiff,

16 vs.  
17 OLD REPUBLIC TITLE INSURANCE  
18 GROUP, INC., et al.,  
19 Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
OLD REPUBLIC NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO DEUTSCHE BANK'S  
OPPOSITION TO OLD REPUBLIC  
NATIONAL TITLE INSURANCE  
COMPANY'S MOTION TO DISMISS  
[ECF No. 30]**

**(Second Request)**

1 COMES NOW Defendant Old Republic National Title Insurance Company (“Old  
 2 Republic”) and Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee Under the  
 3 Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7  
 4 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby  
 5 stipulate and agree as follows:

6       1. On December 10, 2020, Old Republic filed a Motion to Dismiss [ECF No. 15];  
 7       2. On March 18, 2021, Deutsche Bank filed its response in opposition to Old Republic’s  
           motion to dismiss [ECF No. 30];  
 8       3. Old Republic’s deadline to file its reply memorandum responsive to Deutsche Bank’s  
           opposition to Old Republic’s motion to dismiss is currently April 8, 2021;  
 9       4. Old Republic’s counsel is requesting a brief extension of time to file the  
 10      aforementioned reply memorandum, through and including April 15, 2021, to afford  
 11      Old Republic’s counsel additional time to review, analyze, and respond to the legal  
 12      arguments set forth in Deutsche Bank’s brief;  
 13       5. Deutsche Bank does not oppose the requested extension;  
 14       6. This is the second request for an extension which is made in good faith and not for  
 15      purposes of delay;

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**IT IS SO STIPULATED** that Old Republic’s deadline to respond to Deutsche Bank’s opposition to Old Republic’s motion to dismiss [ECF No. 30] is hereby extended through and including April 15, 2021.

Dated: April 5, 2021

**EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP**

By: /s/- Sophia S. Lau

SCOTT E. GIZER

SOPHIA S. LAU

Attorneys for Defendant OLD REPUBLIC  
NATIONAL TITLE INSURANCE COMPANY

Dated: April 5, 2021

## WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Robbins

DARREN T. BRENNER

LINDSAY D. ROBBINS

Attorneys for Plaintiff DEUTSCHE BANK  
NATIONAL TRUST COMPANY

## **IT IS SO ORDERED:**

Dated: April 6, 2021

By: *[Signature]*  
UNITED STATES DISTRICT JUDGE

**EARLY 28  
SULLIVAN  
WRIGHT  
GIZER &  
MCRAE LLP**  
ATTORNEYS AT LAW

**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP